

**BOARD OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246  
SACRAMENTO, CA 94244-2460  
Website: [www.bof.fire.ca.gov](http://www.bof.fire.ca.gov)  
(916) 653-8007



**December 15, 2014**

**Mary D. Nichols**  
**Chairman, California Air Resources Board**

The Board of Forestry and Fire Protection (BOF) would like to take this opportunity to comment on the proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation as it applies to the U.S. Forest Projects section.

We appreciate in particular the stakeholder process the ARB has engaged in, and believe many of the proposed changes, such as the addition of Alaska, to be very well done.

However, recently proposed changes regarding even-aged management and buffer spatial requirements may have the unintended consequence of preventing participation of over half of the private timberland base in California. The proposed changes may also conflict with the Forest Practice Rules of this State. This is important, as the Notice of Hearing and supporting documents states:

*"During the process of developing the proposed regulatory action, ARB conducted a search for any similar regulations on this topic and has concluded that these regulations are neither inconsistent nor incompatible with existing state regulations."*

The BOF has unanimously asked me to forward this concern to you. In addition, given the importance of this issue, they urge a delay in adopting amendments to the protocol to allow for additional stakeholder input, and to assure that our regulatory programs are not in conflict.

Sincerely

George Gentry

Executive Officer